

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

LUIS A. ACEVEDO GARCIA

Plaintiffs

vs.

HON. ROBERTO VERA-MONROIG,

Defendants

CILVIL NO: 97-2639 (JP)

REPLY

TO MOTION FOR THE IMPOSITION OF SANCTIONS

TO THE HONORABLE COURT:

COMES NOW, the Municipality of Adjuntas, and in reply to Plaintiffsø averments respectfully avers and prays as follows.

- I. Plaintiffsø counsel erroneously states that there was an agreement that the check in payment of the \$420,000.00 would be òsent to the subscriber for distribution.ö
2. The only agreement between Plaintiffsø counsel and the undersigned was that she would convey this request to her client and that he, not the appearing counsel that would make this decision.

3. In view of the fact that the check of the interests was sent by certified mail on the 15 of February and had not been received by Plaintiff's counsel, the defendant decided to have the check consigned.

4. Plaintiff's counsel decided to call a meeting of all his clients for them to receive the partial payment. This is a decision that was made without our knowledge or input. The undersigned has no control over the acts of brother counsel.

5. As to our failure to file the financial plan with our Motion in Compliance takes us by surprise. We attached said plan and have not received any notification from the clerk which states otherwise. However, if this is the case, which we doubt, it was due to an involuntary error and we will be corrected. We will also send a copy to brother counsel's e-mail address.

6. In sum, the appearing party has complied fully with all the orders of this Honorable Court. Consigning the funds and not sending them by certified mail, was a decision made to ensure swift and secure delivery, given the past experience; not a politically motivated decision.

7. As to the other claims reiterated by Plaintiff's counsel and the orders requested, we abstain from making any comments and leave this to the total discretion of this Honorable Court.

In Ponce Puerto Rico this 18 day of March 2008.

WHEREFORE it is respectfully requested that the imposition of sanctions requested be **DENIED**.

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorneys in the above entitled case.

Respectfully Submitted;

s/Evelyn Quiñones-Carrasquillo
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